

US EPA ARCHIVE DOCUMENT

Enbridge Energy, Limited Partnership
333 S. Kalamazoo Avenue
Marshall, Michigan 49068
P. 269-781-1195
F. 269-789-9135

Rich Adams
Vice President, U.S. Field Operations



January 30, 2013

Mr. Ralph Dollhopf
Federal On-Scene Coordinator and Incident Commander
United States Environmental Protection Agency
801 Garfield Avenue, #229
Traverse City, MI 49686

RE: In the Matter of Enbridge Energy Partners, L.P., *et al*, Docket No. CWA 1321-5-10-001

Dear Mr. Dollhopf:

Enbridge Energy, Limited Partnership (Enbridge) has reviewed the *Sediment Trap Monitoring and Maintenance Plan* (Plan) and the monitoring data that was collected during monitoring activities in 2012. Based on a qualitative evaluation of the area of Heavy and Moderate poled locations (50 percent or greater of the area of the sediment trap delineated as Heavy or Moderate through the use of poling), 5 areas have triggered a response pursuant to the Plan approved by the United States Environmental Protection Agency (U.S. EPA) on July 10, 2012. These areas are identified in the Plan as:

- Ceresco Impoundment,
- Mile Post (MP) 10.4 North (N),
- Mile Post (MP) 14.75 Right Descending Bank (RDB),
- MP 21.50 RDB, and
- Delta Z.

In accordance with the Plan, Enbridge is preparing a response plan to address the identified triggers. It is however, Enbridge's belief that the current Plan is deficient in many respects including, but not limited to:

- Contradictory use of terms related to geomorphic areas and sediment traps.
- The use of poling as a trigger for active removal as opposed to actual quantity of Line 6B oil identified within the sediment traps.
- No consideration for environmental impacts associated with active removal, decisions should be based on utilization of a revised NEBA.
- Limited to the use of the "toolbox" as a removal technique when poling trigger is reached.

As such, Enbridge proposes the current Sediment Trap Monitoring and Maintenance Plan be withdrawn and that a revised or modified Plan be developed to better meet the objectives of the current remedial efforts.

Please contact myself or Enbridge's Incident Commander, John Sobojinski, if you have any questions.

Sincerely,

ENBRIDGE ENERGY, LIMITED
PARTNERSHIP
By Enbridge Pipelines (Lakehead)
L.L.C.
Its General Partner

A handwritten signature in black ink, appearing to read 'Richard Adams', with a long horizontal line extending to the right.

Richard Adams
Vice President, U.S. Field Operations

CC: John Sobojinski, Enbridge
Dave Bareham, Enbridge
Michelle DeLong, MDEQ